

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Camahan

DIVISION OF
P.O. Box 176

TRB, K.A.
Copy for staff
return R&R

JAN 12 1996

CERTIFIED MAIL: Z 200 416 358
RETURN RECEIPT REQUESTED

Mr. Jeff Creason
Air Quality Engineer
Health Department
Air Quality Section
21st Floor City Hall
414 E. 12th Street
Kansas City, MO 64106

RE: A Request for a Written Response Regarding Bake-off Ovens

Dear Mr. Creason:

We are in receipt of your letter dated December 18, 1995 regarding your question: "Are burn-off or bake-off ovens considered to be incinerators as defined in Missouri State Rule 10 CSR 10-6.020?"

It is the Department's view that not all burn-off or bake-off ovens are considered to be incinerators. Bake-off ovens that are utilized to separate paints from the coated metal parts are not considered to be incinerators (must have a federally enforceable permit condition that limits ovens to painted metal parts). However, bake off ovens which are used to burn paper or plastic coverings of insulated copper wire are incinerators. In other words, it is not only the equipment that determines whether a bake off oven is an incinerator, but also the process that is involved. Burning-off insulated copper wire is believed to be a salvage operation; whereas removing paints from metal parts or adhesives using brake shoes ovens, for example, are considered to be cleaning operations. In most cases, the cleaned metals are reused as part of the facility's feed materials.

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This clarification is not intended to reduce the local agencies' ability to implement a more stringent definition of an incinerator or any requirements pertaining to an incinerator if the Local agencies possess the authority to do so. If you have any questions or need additional information, please contact Steve Feeler at (314) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Roger D. Randolph
Director

RDR:rmp

c: Randy Raymond, APCP
Steve Feeler, APCP
Refaat Mefrakis, APCP
Dave Bradford, SLRO
Richard Vani, KCRO
Tracy McCracken, SWRO
Jim Burris, SERO
Sam Wilson, NERO
Charles A. Wildt, St. Louis County
Ronald Steinkamp, City of St. Louis
Brian Adams, Springfield